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9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,) NO. 21-cr-429 YGR
14 Plaintiff,)
15 v.) STIPULATION AND [PROPOSED] ORDER
16 RAY GARCIA,) CONTINUING STATUS CONFERENCE AND
17 Defendant.) EXCLUDING TIME UNDER THE SPEEDY TRIAL
18) ACT

19 A status conference in the above-captioned case is scheduled for May 5, 2022. Counsel for the
20 United States and counsel for the defendant jointly stipulate and request that that status conference be
21 continued to May 11, 2022, and that time be excluded under the Speedy Trial Act from May 5, 2022 to
22 May 11, 2022.

23 The Court has notified the parties that the Court is unavailable on May 5, 2022. The government
24 and counsel for the defendant have agreed that time be excluded under and the Speedy Trial Act so that
25 defense counsel can continue to prepare. The government has produced voluminous discovery to
26 defense counsel. For these reasons, the parties stipulate and agree that excluding time until May 11,
27 2022, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The

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1 parties further stipulate and agree that the ends of justice served by excluding time from May 5, 2022 to
2 May 11, 2022, from computation under the Speedy Trial Act outweighs the best interests of the public
3 and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

4 The undersigned Assistant United States Attorney certifies that she has obtained approval from
5 counsel for the defendant to file this stipulation, request, and proposed order.

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7 IT IS SO STIPULATED.

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9 DATED: March 24, 2022

10 _____
11 /s/ Molly K. Priedeman
12 MOLLY K. PRIEDEMAN
13 Assistant United States Attorney

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15 DATED: March 24, 2022

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17 /s/ James Reilly
18 JAMES REILLY
19 Attorney for the Defendant

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1 **PROPOSED ORDER**

2 Based upon the representations of counsel and for good cause shown, the Court finds that failing
3 to exclude the time from May 5, 2022 to May 11, 2022, would unreasonably deny defense counsel and
4 the defendant the reasonable time necessary for effective preparation and continuity of counsel, taking
5 into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(B)(iv). The Court further finds that
6 the ends of justice served by excluding the time from May 5, 2022 to May 11, 2022, from computation
7 under the Speedy Trial Act outweighs the best interests of the public and the defendant in a speedy trial.
8 Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from May 5,
9 2022 to May 11, 2022, shall be excluded from computation under the Speedy Trial Act and the status
10 conference is continued to May 11, 2022.

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12 IT IS SO ORDERED.

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14 DATED: March 24, 2022

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16 THE HONORABLE VONNIE GONZALEZ ROGERS
17 United States District Judge
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AND ~~[PROPOSED]~~ ORDER

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